

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	
	:	Case No. 22-20823-GLT
U LOCK, INC.,	:	Chapter 7
	:	
Debtor.	:	
	:	
CHRISTINE BIROS,	:	Related Doc. Nos.: 340, 357 & 368
	:	
Movant,	:	
	:	Hearing Date: July 14, 2023 @1:30pm
v.	:	
	:	
SHANNI SNYDER,	:	
	:	
Respondent.	:	
	:	

EXHIBIT AND WITNESS LIST ON BEHALF OF MOVANT, CHRISTINE BIROS

Christine Biros (the “Movant”), by and through her undersigned counsel, Bernstein-Burkley, P.C., hereby files this *Exhibit and Witness List* stating as follows:

LIST OF POTENTIAL WITNESSES

1. Shanni Snyder
14390 Route 30
North Huntingdon, PA 15642
2. Kash Snyder
670 Lime Street
Irwin, PA 15642
3. George Snyder
150 Leger Road
Irwin, PA 15642

The Movant reserves the right to call any witnesses identified by the Respondents.

Movant also reserves the right to supplement and/or amend this witness list.

EXHIBIT LIST

Exhibit Number	Bates Range	Date of Exhibit	Witness	Description	Objections/ Rulings/ Exceptions
1	BIROS_000001 - BIROS_000005	4/9/18	Shanni Snyder	Petition and Verification for In Forma Pauperis Westmoreland County Action No. 617 of 2018_REDACTED	Objection
2	BIROS_000006 - BIROS_000068	5/15/18	Shanni Snyder	Shanni Sue Snyder's Voluntary Petition for Individuals Filing for Bankruptcy Bankr. W.D. Pa. Case No. 18-21983-CMB	
3	BIROS_000069 - BIROS_000082	6/4/18	Shanni Snyder	Shanni Sue Snyder's Ch. 7 Statement of Current Monthly Income Bankr. W.D. Pa. Case No. 18-21983-CMB	
4	BIROS_000083 - BIROS_000097	10/01/18	George Snyder	Discovery Responses from Westmoreland County Action 4886 of 2017	Objection
5	BIROS_000098 - BIROS_000190	4/29/19	Kash Snyder	Trial Transcript from Westmoreland County Action No. 4886 of 2017	Objection

Exhibit Number	Bates Range	Date of Exhibit	Witness	Description	Objections/ Rulings/ Exceptions
6	BIROS_000191 - BIROS_000198	Dated: 8/22/19 Docketed: 8/23/19	Shanni Snyder, George Snyder and Kash Snyder	Non-Jury Trial Opinion and Order of Court from Westmoreland County Action No. 4886 of 2017	Objection
7	BIROS_000199 - BIROS_000207	7/14/21	Shanni Snyder	Complaint for Violation of Fair Labor Standards filed in W.D. Pa. Case No. 2:21-cv-904	
8	BIROS_000208 - BIROS_000216	10/18/21	Shanni Snyder	Transcript for Default Judgment Hearing before W.D. Pa. Case No. 21-00904	
9	BIROS_000217 - BIROS_000218	3/18/22	Shanni Snyder	Praeipie for Writ of Summons in Equity and Assumpsit and For Lis Pendens in Westmoreland County Action No. 928 of 2022	Objection
10	BIROS_000219 - BIROS_000222	5/9/22	Shanni Snyder	Amended Involuntary Petition Bankr. W.D. Pa. Case No. 22-20823-GLT	

Exhibit Number	Bates Range	Date of Exhibit	Witness	Description	Objections/ Rulings/ Exceptions
11	BIROS_000223 - BIROS_000224	Dated: 5/13/22 Docketed: 5/17/22	George Snyder	Order Denying Petition to Strike in Westmoreland County Action No. 4886 of 2017	Objection
12	BIROS_000225	5/19/22	Shanni Snyder	Shanni Snyder Entry of Appearance in Westmoreland County Action No. 17 CJ 04886	Objection
13	BIROS_000226 - BIROS_000238	5/19/22	Shanni Snyder	Shanni Snyder Notice of Appeal in Westmoreland County Action No. 17 CJ 04886	Objection
14	BIROS_000239 - BIROS_000242	5/19/22	George Snyder and Kash Snyder	U Lock Inc's Notice of Bankruptcy in Westmoreland County Action No. 17 CJ 04886	Objection
15	BIROS_000243 - BIROS_000247	5/27/22	Shanni Snyder	Proof of Claim Bankr. W.D. Pa. Case No. 22-20823-GLT	

Exhibit Number	Bates Range	Date of Exhibit	Witness	Description	Objections/ Rulings/ Exceptions
16	BIROS_000248 - BIROS_000265	9/9/22	George Snyder and Shanni Snyder	341 (a) Transcript Bankr. W.D. Pa. Case No. 22-20823-GLT	
17	BIROS_000266 - BIROS_000271	1/17/23	Kash Snyder and Shanni Snyder	Cont 341 Transcript Bankr. W.D. Pa. Case No. 22-20823-GLT	
18	BIROS_000272 - BIROS_000273	2/12/23	George Snyder	Declaration of George Snyder Bankr. W.D. Pa. Case No. 22-20823-GLT	
19	BIROS_000274 - BIROS_000276	2/14/23	Shanni Snyder	Supreme Court Pennsylvania Docket No. 259 WAL 2021 Allocatur Docket Sheet	Objection
20	BIROS_000277 - BIROS_000283	2/14/23	Shanni Snyder	Supreme Court of Pennsylvania Docket No. 1841 WDA 2019 Appeal Docket Sheet	Objection

Exhibit Number	Bates Range	Date of Exhibit	Witness	Description	Objections/ Rulings/ Exceptions
21	BIROS_000284 - BIROS_000301	6/12/23	Shanni Snyder	Shanni Snyder's Responses and Objections to the First Set of Requests for Admission, Interrogatories and Requests for Production of Documents in Bankr. W.D. Pa. Case No. 22-20823-GLT	
22	BIROS_000302 - BIROS_000304	6/20/23	Shanni Snyder	Letter from David L. Fuchs, Esq. in Response to Letter dated June 15, 2023, Regarding Various Discovery Responses Bankr. W.D. Pa. Case No. 22-20823-GLT	
23	BIROS_000305 - BIROS_000308	7/6/23	Shanni Snyder	Letter from David L. Fuchs, Esq. with Shanni Snyder's Supplemental Discovery Responses Bankr. W.D. Pa. Case No. 22-20823-GLT	

The Movant reserves the right to use any exhibits identified by the Respondent. The Movant reserves the right to use any documents not identified herein for the sole purpose of rebuttal or impeachment. Finally, the Movant reserves the right to supplement and/or amend this list of Exhibits.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

Dated: July 7, 2023

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